



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	Minnesota Crop Improvement Association (MCIA)
Est. Number:	N/A
Physical Address:	1900 Hendon Avenue, St. Paul, MN 55108
Mailing Address:	1900 Hendon Avenue, St. Paul, MN 55108
Contact & Title:	Cindy Wippler, Manager of Organic Services
E-mail Address:	Wippl001@tc.umn.edu
Phone Number:	612-225-7766
Auditor(s):	Steve Ross, Lead Auditor; Patty Heckart, Auditor; Bob Crook, Observer
Program:	USDA National Organic Program (NOP)
Audit Date(s):	February 2 - August 9, 2007
Audit Identifier:	NP7033DDA
Action Required:	Yes
Audit Type:	Surveillance - Accreditation Renewal Audit
Audit Objective:	To verify continuing compliance to the audit criteria; and to verify the implementation and effectiveness of corrective actions in addressing the previous non-compliance.
Audit Criteria:	7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000, updated September 11, 2006
Audit Scope:	MCIA's quality manual dated November 1, 2006, including personnel, processes, procedures, facilities, and related records.
Location(s) Audited:	MCIA office in St. Paul, MN; Karlsburger Foods in Montecello, MN; and Roger Flint Farm in Roscoe, MN.

MCIA became an accredited certifying agent to the USDA National Organic Program (NOP) on April 29, 2002 for crop and handling and on June 4, 2004 for wild crop. MCIA is also approved for the USDA ISO Guide 65 for Organics and a concurrent audit review was done during the NOP audit.

The 5 Year Accreditation Audit process started on February 2, 2007, with a review of the documents submitted by MCIA and concluded with the on-site surveillance audit which was conducted on August 6-9, 2007.

MCIA is accredited for crops, wild crops, and handlers. MCIA is in the process of gaining accreditation for livestock and is awaiting approval from the NOP Administrator. Currently MCIA has approved in 2007 25 crops, 1 wild crop, and 41 handlers. Many more are in the process of application or inspection reviews. The wild crop was not observed with a witness audit as the wild crop is Maple Syrup and there



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is no activity to observe in the summer; however, the client file was reviewed extensively. Six other client files in addition to the on-site witness audits were reviewed. MCIA certifies clients in Minnesota and surrounding states and continues to be available for clients in other states. All personnel involved are employees of MCIA with the exception of two subcontracted inspectors who have done very limited work. Cindy Wippler is now the Manager of the Organic Program, taking over from Brenda Rogers on April 1, 2007 and is the responsible person for correspondence and final decision making. Brenda continues with MCIA as a Field Supervisor and inspector of organics for MCIA.

The application and files for initial and annual certification are primarily reviewed by the Organic Program Specialist. The inspections are conducted by MCIA personnel. The Certification Committee reviews the files after the inspections with the final review and decision for certification of clients made by the Manager of Organic Services. The audit included observations of two renewal inspections by MCIA.

MCIA supplies their clients with the MCIA Organic Handbook, applicable Organic System Plans, and requires the clients to obtain the NOP Rule either from the MCIA website or by hard copy from the NOP, which MCIA provides the name and address to obtain the Rule.

MCIA submitted the NOP Annual Updates for 2005 and 2006. These annual updates failed to have reports written by the ARC Branch; however, during the audit copies of the 2005 and 2006 annual updates were reviewed and found that MCIA continued to be in compliance to the NOP Rule with no findings from these reviews.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that MCIA is currently operating in compliance to the audit criteria except as noted in the non-compliances. The corrective actions for two non-compliances from the previous audit were verified and found to be implemented; therefore, the non-compliances were cleared. Three non-compliances were identified during the audit.

NP7064DDA.NC1 – Cleared

NP7064DDA.NC2 – Cleared

NP7033DDA.NC1 – NOP §205.403(c)(1-3) states, "The onsite inspection must verify 1) the operation's compliance or capability to comply with the Act and the regulations in this part; 2) that the information, including the organic production or handling system plan, provided in accordance with the §§205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; and 3) that prohibited substances have not been and are not being applied to the operation...." *During the witness inspection of the handling operation, the inspector failed to review the following parts of the organic system plan or information provided by the certifying agent.*

- 1. The cleaning agent identified (SEPCO) as an organic cleaning agent for final rinse was not reviewed to determine the acceptability of the product.*
- 2. The finished product labels were not reviewed for comparison to labels approved by MCIA.*
- 3. The citric acid used as a Non-agricultural product was not reviewed to determine compliance to*



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§205.605(a).

4. *The inspection did not verify the organic status of raw materials on hand in the warehouse to determine compliance.*
5. *The inspector did not inform the company during the exit meeting of the need for the company to have a copy of the NOP Rule in order to ensure that the company was producing product in compliance to the NOP Rule.*
6. *The preliminary review of the organic system plan found that the company indicated the retention of records was for 3 years. MCIA requested that the inspector verify that the company would keep records for 5 years. The companies batch sheets for ground chicken meat stated to “keep this record for one year”. The inspector did not verify the records would be kept for 5 years.*

NP7033DDA.NC2 – NOP §205.501(a)(21)(b)(2) states, “A private or governmental entity accredited as a certifying agent... does not require compliance with any production or handling practices other than those provided for in the Act...” *The MCIA Organic System plan and MCIA Organic Handbook Procedures given to the client has additional requirements not accounted for in the Act.*

1. *Land Requirements: A minimum buffer zone of 25 feet will be required from adjoining land not under organic management.*
2. *Adjacent land owners must be given notice of intent to produce an organic crop.*
3. *Crop Rotation: MCIA requires a minimum of three crops in a crop rotation plan for annual crops. Of these three crops, no more than two can be row crops, and the other should be a solid-seeded or turf crop.*
4. *MCIA is approved for USDA ISO Guide 65 but only issues client certificates as approved to the NOP Organic Standard. MCIA is requiring all clients to have complaint files as a condition of certification for the NOP Standard.*

NP7033DDA.NC3 – NOP §205.642 states, “...The certifying agent shall provide each applicant with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification.... The certifying agent may set the nonrefundable portion of the certification fees; however, the nonrefundable portion of certification fees must be explained in the fee schedule submitted to the Administrator.”

1. *MCIA is not providing the applicants with an estimate of the cost of certification or annual cost of updating certification. MCIA is providing the applicants with the fee structure and requiring the applicant to figure their own cost.*
2. *MCIA is requiring a \$50 application fee each year that is non-refundable. MCIA has not explained this on the fee schedule submitted to the Administrator.*